

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, and
BELINDA NUCIFORA

Defendants.

Case No. 1:24-cv-07046-PK

**NOTICE OF RICK BUNNEY'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF COUNSEL**

TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Rick Bunney (“Bunney”) respectfully moves this Court for an order: (1) appointing Bunney as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Bunney’s selection of Glancy Prongay & Murray LLP (“GPM”) and Holzer & Holzer, LLC (“Holzer”) as co-lead counsel for the class; and (3) granting such other relief as the Court may deem to be just and proper (the “Motion”).

Bunney seeks appointment as lead plaintiff and approval of his choice of counsel pursuant to the Exchange Act and the PSLRA. This motion is based on this notice, the attached memorandum of law, the declaration of Gregory B. Linkh, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Counsel for Bunney is aware of Your Honor’s Individual Practice Rule VI.A.2.a. requiring that a moving party seek consent from the non-moving parties. However, this Motion is filed pursuant to Section 21D of the Exchange Act, as amended by the PSLRA, which provides that within 60 days after publication of notice of this action, any member of the proposed class may apply to the Court to be appointed as lead plaintiff, whether or not they have previously filed a complaint in the underlying action. Consequently, counsel for Bunney have no way of knowing with certainty who, if any, the competing lead plaintiff candidates will be at this time. Moreover, if Bunney does not file this Motion by today, the deadline under the PSLRA, he may

lose his statutory right to be considered for appointment as lead plaintiff. As such, Bunney requests that the Court's Rule VI.A.2.a. be waived for this Motion.

Respectfully submitted,

DATED: December 6, 2024

GLANCY PRONGAY & MURRAY LLP

By: /s/ Gregory B. Linkh
Gregory B. Linkh (GL-0477)
230 Bunney Ave., Suite 358
New York, NY 10169
Telephone: (212) 682-5340
Facsimile: (212) 884-0988
glinkh@glancylaw.com

Robert V. Prongay
Charles H. Linehan
1925 Century Bunney East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160

HOLZER & HOLZER, LLC
Corey D. Holzer
211 Perimeter Center Parkway, Suite 1010
Atlanta, Georgia 30346
Telephone: (770) 392-0090
Facsimile: (770) 392-0029

*Counsel for Rick Bunney and Proposed Co-Lead
Counsel for the Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On December 6, 2024, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 6, 2024, at New York, New York.

/s/ Gregory B. Linkh
Gregory B. Linkh